

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ,
MARCUS MARTIN, NATALIE ROMERO,
CHELSEA ALVARADO, THOMAS BAKER
and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSLEY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOCH”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

DECLARATION OF MICHAEL L. BLOCH

I, Michael L. Bloch, on this 4th day of October, 2021, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am Counsel at the law firm Kaplan, Hecker & Fink LLP (“KHF”), one of the law firms representing the Plaintiffs in this action.

2. I am a member in good standing of the Washington, D.C. and New York State Bars. I am also admitted to practice before the U.S. District Court for the Southern District of New York. I have been admitted to appear *pro hac vice* before this Court for and on behalf of the Plaintiffs in the above-captioned action.

3. In September and October 2021, I met and conferred with James Kolenich, counsel for Defendants Jason Kessler, Nathan Damigo, and Identity Evropa, on several occasions regarding his clients’ proposed witness lists [ECF Nos. 1043 and 1141].

4. I told Mr. Kolenich that Plaintiffs would move to preclude any witnesses that had not been properly disclosed to Plaintiffs, unless Defendants Kessler, Damigo, and Identity Evropa made their undisclosed witnesses available for depositions.

5. Mr. Kolenich filed an Amended Witness list on October 2, 2021 [ECF No. 1141], and subsequently agreed to make Daniel Ferguson, a previously undisclosed witness, available for a deposition prior to trial.

6. On October 4, 2021, I met and conferred with Defendant Christopher Cantwell via a telephone call regarding his witness list [ECF No. 1086].

7. I told Mr. Cantwell that certain witnesses on his witness list had not been properly disclosed to Plaintiffs.

8. I said that if Mr. Cantwell arranged depositions of the witnesses on his list who had not been properly disclosed, Plaintiffs would not move to preclude those witnesses.

9. Mr. Cantwell said that he cannot arrange depositions of any of his witnesses.

10. I therefore informed Mr. Cantwell that Plaintiffs would move to preclude his undisclosed witnesses.

Executed on: October 4, 2021
New York, New York

A handwritten signature in black ink, appearing to read "Michael L. Bloch", written over a horizontal line.

Michael L. Bloch